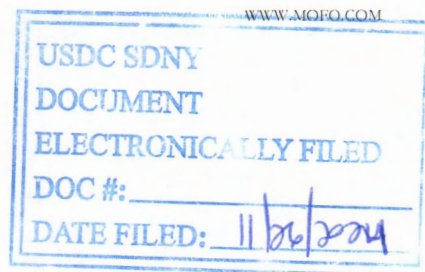


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November 25, 2024

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VIA ECF

Hon. Colleen McMahon
 Daniel Patrick Moynihan United States Courthouse
 500 Pearl Street
 New York, NY 10007-1312

Re: *Raw Story Media, Inc., et al. v. OpenAI, Inc., et al.*, Case No. 1:24-cv-01514-CM

Dear Judge McMahon:

I represent Defendants OpenAI, Inc., OpenAI GP, LLC, OpenAI, LLC, OpenAI OpCo LLC, OpenAI Global LLC, OAI Corporation, LLC, and OpenAI Holdings, LLC (collectively, "OpenAI") in this matter. The parties respectfully and jointly request that the Court enter an order modifying and extending the schedule to respond to Plaintiffs' pending Motion for Leave to File a First Amended Complaint (Dkt. No. 118). Plaintiffs filed their motion on November 21, 2024. Accordingly, pursuant to Section V.F. of Your Honor's Individual Practices and Procedures, the current response deadlines are as follows:

- Defendants' response to Plaintiffs' motion: December 5, 2024
- Plaintiffs' reply in support of motion: December 10, 2024

The parties respectfully request that the Court adjust the schedule to the following:

- Defendants' response to Plaintiffs' motion: December 20, 2024
- Plaintiffs' reply in support of motion: January 21, 2025

This is the first request for an extension of the schedule to respond to Plaintiffs' motion. The parties previously requested an extension of the case schedule in light of ongoing discovery. (Dkt. No. 92) The Court granted the joint request. (Dkt. No. 99)

Counsel for the parties have conferred, and all parties consent to this motion. The requested extension does not affect any other scheduled dates because there is currently no operative complaint. The parties appreciate the Court's consideration of their joint request.

MORRISON FOERSTER

Hon. Colleen McMahon
November 25, 2024
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Sincerely,

A handwritten signature in black ink, appearing to read 'V. Ranieri', with a stylized flourish extending to the right.

Vera Ranieri
Of Counsel
Counsel for OpenAI